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May 24, 2022

**VIA ECF**

The Honorable Robert D. Mariani  
United States District Court for the Middle District of Pennsylvania  
William J. Nealon Federal Bldg. & U.S. Courthouse  
235 N. Washington Avenue  
Scranton, PA 18503

**Re: Steven Plavin et al. v. Group Health Inc., No. 3:17-cv-01462**

Dear Judge Mariani:

The parties in the above-referenced matter write jointly to request modification of the case management schedule governing this litigation. Under the Order currently governing the schedule for this matter ("Scheduling Order") (ECF No. 91, issued March 26, 2022), the deadline for fact discovery is June 10, 2022. The parties have been diligently engaging in discovery activities but have met and conferred and agree that additional time for their ongoing discovery efforts is necessary, including to schedule and complete remaining fact depositions.

The parties propose the following amendments to the Scheduling Order:

- Close of Fact Discovery: July 8, 2022;
- Plaintiffs' affirmative expert reports related to class certification, if any, due: August 12, 2022;

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- Defendant's affirmative expert reports related to class certification, if any, due: September 9, 2022;
- Supplementations to the parties' expert reports related to class certification, if any, due: October 7, 2022;
- Plaintiffs' Motion for Class Certification due: October 26, 2022;
- Defendant's Opposition to Class Certification due: December 9, 2022; and,
- Plaintiffs' Reply due: January 6, 2023.

All remaining deadlines in the Scheduling Order would remain in effect and continue to govern this matter.

The parties therefore stipulate and agree, and respectfully request that the Court grant the Stipulated Order Modifying the Scheduling Order, attached hereto. In accordance with Local Rule 7.1, we also include and file a Certificate of Concurrence.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Halley W. Josephs

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